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20 Attorneys for Plaintiff
21 UNITED STATES OF AMERICA

22 UNITED STATES DISTRICT COURT

23 FOR THE CENTRAL DISTRICT OF CALIFORNIA

24 UNITED STATES OF AMERICA,

25 No. 2:18-cr-00173 (A) -GW-2

Plaintiff,

GOVERNMENT'S PROPOSED VERDICT FORM

v.

Trial Date: August 2, 2022

Trial Time: 8:30 a.m.

Location: Courtroom of the Hon.
George Wu

JOSE LANDA-RODRIGUEZ, et al.,
[#2-GABRIEL ZENDEJAS-CHAVEZ]

Defendant.

Plaintiff United States of America, by and through its counsel
of record, the Acting United States Attorney for the Central District
of California and Assistant United States Attorneys Shawn J. Nelson,
Gregory Bernstein, Keith D. Ellison, and Gregg E. Marmaro, hereby

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1 submits the Government's Proposed Verdict Form in the above-captioned
2 case.¹

3 Dated: June 24, 2022

Respectfully submitted,

4 STEPHANIE S. CHRISTENSEN
5 Acting United States Attorney

6 SCOTT M. GARRINGER
7 Assistant United States Attorney
Chief, Criminal Division

8 /S/

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13 Assistant United States Attorneys

14 Attorneys for Plaintiff
15 UNITED STATES OF AMERICA

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28 ¹ On July 23, 2022, counsel for defendant represented that
defendant would be filing his own proposed verdict form.

1 **COUNT ONE**

2 **Racketeering Conspiracy**

3 1. We, the Jury, unanimously find the defendant GABRIEL
4 ZENDEJAS-CHAVEZ (*check one*):

5 _____ GUILTY or

6 _____ NOT GUILTY

7 as charged in Count One of the First Superseding Indictment.

8
9 (*If the response to Question 1 is Guilty, you must also answer*
10 *Question 2. If the response to Question 1 is Not Guilty, proceed*
11 *directly to Question 5.*)

12
13 2. We, the Jury, having found the defendant GABRIEL ZENDEJAS-
14 CHAVEZ guilty of Count One, further unanimously find that it was
15 reasonably foreseeable to the defendant that the overall conspiracy
16 would engage in a pattern of racketeering activity consisting of at
17 least the following crimes (*select all that apply*):

18 _____ Murder

19 _____ Extortion

20 _____ Drug Trafficking

21 _____ Witness Tampering

22 _____ Witness Retaliation

23 _____ Money Laundering

24
25
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27 (*continued on next page*)

1 (If the response to Question 1 is Guilty and in reaching such a
2 verdict you unanimously find that the pattern of racketeering
3 activity would include drug trafficking, you must also answer
4 Questions 3 and 4. If the response to Question 1 is Not Guilty, or
5 if you found the defendant Guilty but further found that the pattern
6 of racketeering activity would not include drug trafficking, proceed
7 directly to Question 5.)

8
9 3. We, the Jury, having found the defendant GABRIEL ZENDEJAS-
10 CHAVEZ guilty of Count One, further unanimously find that it was
11 reasonably foreseeable to the defendant that the overall drug
12 conspiracy would involve the following amount of methamphetamine
13 (pick the largest applicable amount):

14 a. At least 50 grams of methamphetamine.

15 _____ YES

16 _____ NO

17 b. At least 5 grams of methamphetamine.

18 _____ YES

19 _____ NO

20 c. Less than 5 grams of methamphetamine.

21 _____ YES

22 _____ NO

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25 (continued on next page)

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1 4. We, the Jury, having found the defendant GABRIEL ZENDEJAS-
2 CHAVEZ guilty of Count One, further unanimously find that it was
3 reasonably foreseeable to the defendant that the overall drug
4 conspiracy would involve the following amount of a mixture or
5 substance containing a detectable amount of heroin (*check one*):

6 At least 100 grams of a mixture or substance containing a
7 detectable amount of heroin.

8 ____ YES

9 ____ NO

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13 (continued on next page)

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1 **COUNT FIVE**

2 **Drug Trafficking Conspiracy**

3 5. We, the Jury, unanimously find the defendant GABRIEL
4 ZENDEJAS-CHAVEZ (*check one*):

5 GUILTY or

6 NOT GUILTY

7 as charged in Count Five of the First Superseding Indictment.

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9 (*If the response to Question 5 is Guilty, you must also answer*
10 *Questions 6 and 7. If the response to Question 4 is Not Guilty,*
11 *proceed directly to Question 8.*)

12
13 6. We, the Jury, having found the defendant GABRIEL ZENDEJAS-
14 CHAVEZ guilty of Count Five, further unanimously find that it was
15 reasonably foreseeable to the that the overall drug conspiracy would
16 involve the following amount of methamphetamine (*pick the largest*
17 *applicable amount*):

18 a. At least 50 grams of methamphetamine.

19 YES

20 NO

21 b. At least 5 grams of methamphetamine.

22 YES

23 NO

24 c. Less than 5 grams of methamphetamine.

25 YES

26 NO

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28 (*continued on next page*)

1 7. We, the Jury, having found the defendant GABRIEL ZENDEJAS-
2 CHAVEZ guilty of Count Five, further unanimously find that it was
3 reasonably foreseeable to the defendant that the overall drug
4 conspiracy would involve the following amount of a mixture or
5 substance containing a detectable amount of heroin:

6 At least 100 grams of a mixture or substance containing a
7 detectable amount of heroin.

8 ____ YES

9 ____ NO

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12 (continued on next page)

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1 **COUNT SEVEN**

2 **Possession of Methamphetamine with Intent to Distribute,**

3 **Aiding and Abetting**

4 8. We, the Jury, unanimously find defendant GABRIEL ZENDEJAS-
5 CHAVEZ (*check one*):

6 GUILTY or

7 NOT GUILTY

8 as charged in Count Seven of the First Superseding Indictment.

9
10 (*If your response to Question 8 is Guilty, you must also answer*
11 *Question 9. If the response to Question 8 is Not Guilty, proceed*
12 *directly to Question 10.*)

13
14 9. We, the Jury, having found the defendant GABRIEL ZENDEJAS-
15 CHAVEZ guilty of Count Seven, further unanimously find that the
16 defendant aided and abetted in the possession with intent to
17 distribute the following amount of methamphetamine (*check one*):

18 At least 5 grams of methamphetamine.

19 YES

20 NO

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27 (*continued on next page*)

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COUNT EIGHT

Possession of Heroin with Intent to Distribute,

Aiding and Abetting

10. We, the Jury, unanimously find defendant GABRIEL ZENDEJAS-CHAVEZ (*check one*):

GUILTY or

NOT GUILTY

as charged in Count Eight of the First Superseding Indictment.

DATED in Los Angeles, California

[FOREPERSON OF THE JURY]